## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **EASTERN DIVISION**

UNITED STATES OF AMERICA	)
	)
V.	) Case No. 3:07cr146-MHT
ROGER LADRELL McCULLOUGH	)

#### **UNOPPOSED MOTION TO CONTINUE**

Comes now Defendant Roger Ladrell McCullough, by and through counsel, and shows as follows:

- 1. This case is on a settlement course. The parties are working on a cooperation plea agreement in this case.
  - 2. This case is on this Court's December 10, 2007 trial docket.
- The parties to this case need additional time to complete proffer sessions, follow up on those sessions, and complete evaluations in order to finalize a cooperation plea agreement in this case.
- 4. The undersigned counsel has discussed this matter with opposing counsel, Assistant United States Attorney Clark A. Morris. Ms. Morris has no objection to continuing this case until the January 14, 2008 trial docket.

WHEREFORE, Defendant Roger Ladrell McCullough moves this Court to continue this case until the January 14, 2008 trial docket.

s/ **Thomas M. Goggans** Ala. State Bar No. 2222-S45-T 2030 East Second Street Montgomery AL 36106

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Attorney for Defendant Roger Ladrell McCullough

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have on this the 26<sup>th</sup> day of November, 2007, electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification to each of the following: A Clark Morris and John T. Harmon.

### s/ Thomas M. Goggans

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